

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

*County of Lake, Ohio v. Purdue
Pharma L.P., et al.,
Case No. 18-op-45032 (N.D. Ohio)*

*County of Trumbull, Ohio v. Purdue
Pharma, L.P., et al.,
Case No. 18-op-45079 (N.D. Ohio)*

“Track 3 Cases”

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**RITE AID DEFENDANTS’ MOTION FOR LEAVE TO FILE UNDER SEAL
THEIR MOTION IN LIMINE TO EXCLUDE
EXHIBIT P-20533 AND EXHIBIT A THERETO**

Rite Aid Defendants¹ seek leave of this Court to file under seal unredacted versions of their Motion in Limine to Exclude Exhibit P-20533 (“Motion in Limine”) and Exhibit A thereto.

Local Civil Rule 5.2 provides that “[n]o document will be accepted for filing under seal unless a statute, court rule, or prior court order authorizes the filing of sealed documents.”

Paragraph 62 of this Court’s Case Management Order No. 2: Protective Order, ECF Doc. 441, issued on May 15, 2018, (the “Protective Order”) states:

Only Confidential or Highly Confidential portions of relevant documents are subject to sealing. To the extent that a brief, memorandum, or pleading references any document designated as Confidential or Highly Confidential, then the brief, memorandum or pleading shall refer the Court to the particular exhibit filed under seal without disclosing the contents of any confidential information. If, however, the confidential information must be intertwined within

¹ Rite Aid Hdqtrs. Corp., Rite Aid of Ohio, Inc., Rite Aid of Maryland, Inc., d/b/a Rite Aid Mid-Atlantic Customer Support Center and Eckerd Corp. d/b/a Rite Aid Liverpool Distribution Center.

the text of the document, a party may timely move the Court for leave to file both a redacted version for the public docket and an unredacted version for sealing.

Exhibit A to the Motion in Limine been marked as Highly Confidential under the Protective Order. The Motion in Limine quotes and references highly confidential information contained in Exhibit A and expert reports that have been marked as Confidential under the Protective Order. In order to comply with the Protective Order, Rite Aid Defendants seek leave to file Exhibit A and an unredacted version of their Motion in Limine under seal.

Therefore, Rite Aid Defendants respectfully request that the Court grant their Motion for Leave to File Under Seal Their Motion in Limine to Exclude Exhibit P-20533 and Exhibit A Thereto.

Dated: August 12, 2021

Respectfully submitted,

/s/ Kelly A. Moore

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CERTIFICATE OF SERVICE

I certify that on August 12, 2021, the foregoing was electronically filed using the Court's CM/ECF system, and all counsel of record were served by operation of that system.

/s/ Kelly A. Moore

Kelly A. Moore